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XF: 347,07

TO: Rick Johnson

FROM: E. R. Taylor
DATE: November 22, 1989

Interoffice
Communication

SUBJ: SARA 313 CUSTOMER NOTIFICATIONS

VISTA

The EPA, under Section 313 of SARA Title III, requires manufacturers (SIC codes 20-39) to notify customers (SIC codes 20-39) on products containing SARA 313 chemicals with the first shipment of each calendar year. Vista is subject to this regulation.

Attached is an updated list of Vista products that contains SARA 313 chemicals and a sample notification letter.

After talking to the EPA today, I have the following responses to your questions.

- If we sell Vista products to distributors, then it is up to the distributors to send the SARA 313 information that we supply on to their customers.
- Customers in Puerto Rico, Guam, etc. and all other U. S. territories and possessions must receive notifications.
- To stay within the intent of the law, we should plan to send all sites a notification. I believe that by sending the notices out before 1/1/90, we will meet the intent of the regulation.

We need to develop a listing of all customers using the attached products as soon as possible and determine the best way of informing these customers by 1/1/90.


E. R. Taylor

dlj

cc: M. H. Horowitz
D. L. Cohen

VVV 000007072

ALFOL 4 ALCOHOL
AQUEOUS ALUMINUM CHLORIDE
BLANE PVC COMPOUNDS
BUTADIENE CONCENTRATE
CATAPAL G AND GST ALUMINA
EDC/VCM HEAVY ENDS
ETHYLENE
ETHYLENE DICHLORIDE (EDC)
HEAVY AROMATIC DISTILLATE (HAD)
LIGHT AROMATIC CONCENTRATE (LAC)
MURIATIC ACID
PREMIERE PVC COMPOUNDS
ROTOFLEX
RIGID COMPOUNDS (LEAD STABILIZED)
RIGID DRYBLENDS (LEAD STABILIZED)
PROPYLENE
SPENT SULFURIC ACID
VINYL CHLORIDE
VINYL CHLORIDE LIGHT ENDS
VISTA PVC COMPOUNDS
VISTA 610 PLASTICIZER

VVV 000007073